

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., et al., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re: Docket No. \_\_\_\_

**ORDER ESTIMATING AND TEMPORARILY ALLOWING CLAIMS OF  
LAVVAN, INC. FOR PURPOSES OF VOTING TO ACCEPT OR REJECT THE PLAN**

Upon the motion (the “**Motion**”)<sup>2</sup> of Lavvan, Inc. (“**Lavvan**”) for an order under sections 502 and 1126 of the Bankruptcy Code and Bankruptcy Rules 3001 and 3018(a), estimating and temporarily allowing Lavvan’s Claims for purposes of voting on the Plan; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter an order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation and sufficient cause appearing therefor,

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<sup>1</sup> A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

**IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Pursuant to Bankruptcy Rule 3018(a), Lavvan's Arbitration Claim is hereby allowed in the amount of \$820,458.67, solely for purposes of voting to accept or reject the Plan.
3. Pursuant to Bankruptcy Rule 3018(a), Lavvan's SDNY Claim is hereby allowed in the amount of \$500 million, solely for purposes of voting to accept or reject the Plan.
4. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.